

**In The Matter Of:**

*James H. Gorbey, Jr. v.  
Ashland Construction Co., et al.*

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*Vincent Rizzo  
December 30, 2004*

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[1] My name is Mike Small. I represent  
[2] Ashland Construction Company, Vincent  
[3] Rizzo Construction, Inc. doing business  
[4] as Ashland Construction Company, Joseph  
[5] Rizzo and Vincent Rizzo.

[6] We had an off the record discussion  
[7] in that we were trying to figure out the  
[8] entities that were named by the  
[9] plaintiff in this case. I informed Mr.  
[10] Casey that the only entity in business  
[11] at that time was Ashland Construction,  
[12] Inc., was owned by Joseph Rizzo and  
[13] Vincent Rizzo. That was the entity that  
[14] was on-site at the Longwill residence on  
[15] the date of this incident.

[16] Vincent Rizzo Construction Company  
[17] did not exist at the time of this  
[18] incident. And as far as Joseph Rizzo  
[19] and Sons Construction, I do not  
[20] represent them but it is my  
[21] understanding that they are owned by a  
[22] relative of Joseph and Vincent Rizzo and  
[23] neither Mr. Rizzo or Joseph Rizzo worked  
[24] for that company or have any ownership

[1] Q. I'm doing fine, thank you. This should  
[2] be rather brief and I appreciate you're taking  
[3] the time to do this today. Can I have your  
[4] give full name?

[5] A. Vincent J. Rizzo.

[6] Q. What is your home address?

[7] A. 16 Holly lane, Wilmington, Delaware  
[8] 19807.

[9] Q. Sir, in August of 2002 did you own, in  
[10] part, own a company called Ashland Construction  
[11] Company, Incorporated?

[12] A. That's correct, sir.

[13] Q. Who else owned Ashland Construction  
[14] Company, Incorporated in August of 2000?

[15] A. It was a partnership between my brother  
[16] and I, which was --

[17] Q. What is your brother's name?

[18] A. Joseph P. Rizzo.

[19] Q. What is Joseph P. Rizzo's home address?

[20] A. 900 Butler Avenue, that is Wilmington,  
[21] Delaware, the zip, I'm not sure of the zip  
[22] code.

[23] Q. Did you and your brother, Joseph, own  
[24] Ashland Construction Company, Incorporated as a

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[1] interest, do not having any contact with  
[2] it other than being familier, like a  
[3] cousin.

[4] MR. CASEY: Thank you, Mr. Small.

[5] MR. SMALL: Can you hear us okay?

[6] MR. CASEY: I can.

[7] MR. SMALL: If you have any problems  
[8] let us know. Like I said, Vincent Rizzo  
[9] is here to testify regarding  
[10] jurisdiction today, pursuant to Judge  
[11] Brody's order. And we are still doing a  
[12] search for any documents regarding the  
[13] Longwill residence.

[14] MR. CASEY: Right. There is  
[15] outstanding discovery other than the  
[16] jurisdiction issue. And I understand  
[17] you will be getting that to me.

[18] MR. SMALL: It is being mailed out  
[19] but we are still doing a document search  
[20] as that is much more extensive.

[21] MR. CASEY: All right, thank you.

[22] BY MR. CASEY:

[23] Q. Mr. Rizzo, good morning.

[24] A. Good morning, how are you.

[1] partnership on August 30, 2002?

[2] A. That is correct, sir.

[3] Q. Since that date has the ownership of the  
[4] company changed in any respect?

[5] A. Actually since, since that date the  
[6] company is no longer in business.

[7] Q. As of what date was it no longer in  
[8] business?

[9] A. I would say as of November.

[10] Q. 2004?

[11] A. 2004, yes.

[12] Q. Did any corporate entity, or partnership  
[13] take the place of Ashland Construction Company,  
[14] Incorporated?

[15] A. No. I mean, it is, I mean Ashland  
[16] Construction was dissolved. And that was the  
[17] extent of it. Ashland was not operating as a  
[18] company name.

[19] Q. Do you recognize the entity Vincent Rizzo  
[20] Construction Company, Incorporated?

[21] A. Correct.

[22] Q. You do recognize it?

[23] A. It is, I don't understand the question.

[24] Q. Do you recognize that entity? Do you

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[1] know what it is?  
[2] **A.** It is Vincent Rizzo Construction, yes.  
[3] **Q.** What is it?  
[4] **A.** It is actually, it's a Construction  
[5] Company, that doesn't, it doesn't really  
[6] operate as construction. It's just a property  
[7] holder where our office is at.  
[8] **Q.** What is the relationship, if any, or what  
[9] was the relationship, if any, between Ashland  
[10] Construction Company, Incorporated and Vincent  
[11] Rizzo Construction Company, Incorporated?  
[12] **MR. SMALL:** As of what time?  
[13] **BY MR. CASEY:**  
[14] **Q.** As of at any time since August 30, 2002  
[15] and including that date, sir?  
[16] **MR. SMALL:** Do you know when Vincent  
[17] Rizzo Construction Company started to  
[18] exist?  
[19] **THE WITNESS:** Actually Vincent Rizzo  
[20] existed for a period of time, that was  
[21] actually my father's company. It was  
[22] actually a union shop way back when.  
[23] But the actual company now, the company  
[24] never operated in the construction

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[1] field. It just held the property where  
[2] our office was.  
[3] **BY MR. CASEY:**  
[4] **Q.** As of August 30, 2002, on that date, did  
[5] Vincent Rizzo Construction Company,  
[6] Incorporated exist?  
[7] **A.** As of that date, the actual, the company  
[8] was to hold, held the property. Yes, there was  
[9] a Vincent Rizzo Construction Company.  
[10] **Q.** On that date, August 30, 2002?  
[11] **A.** Correct.  
[12] **Q.** Were any persons affiliated with Vincent  
[13] Rizzo Construction Company, Incorporated on the  
[14] premises at 3220 Coachman Road in Wilmington on  
[15] August 30, 2002?  
[16] **A.** No, sir.  
[17] **Q.** What was your affiliation with Vincent  
[18] Rizzo Construction Company, Incorporated as of  
[19] August 30, 2002?  
[20] **A.** It was just a property holder, the  
[21] company never operated as construction, it just  
[22] held property.  
[23] **Q.** Did the company have any employees?  
[24] **A.** No, sir.

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[1] **Q.** I understand I think. Did Ashland  
[2] Construction Company, Incorporated have any of  
[3] its employees on the premises of the 3220  
[4] Coachman Road address on August 30, 2002?  
[5] **A.** Yes, it was myself and a laborer, a  
[6] helper, which was Salvador Ortiz.  
[7] **Q.** Were there any other persons affiliated  
[8] with Ashland Construction Company, Incorporated  
[9] on the premises of 3220 Coachman Road on August  
[10] 30, 2002 besides yourself and Mr. Ortiz?  
[11] **A.** No, sir.  
[12] **Q.** Where does Salvador Ortiz live?  
[13] **A.** Mexico. As far as an address in Mexico,  
[14] I have no clue what it is.  
[15] **Q.** When did he return to Mexico?  
[16] **A.** I would say over a year and a half ago.  
[17] **Q.** Was he in this country legally as of  
[18] August 30, 2002?  
[19] **MR. SMALL:** Objection, this is for  
[20] jurisdiction for Ashland Construction,  
[21] Vincent Rizzo Construction, Joseph  
[22] Rizzo. He is not party. This is beyond  
[23] Judge Brody's order. I'm going to  
[24] instruct him not to answer.

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[1] **MR. CASEY:** Mike, the reason I'm  
[2] asking, at this juncture, is it does  
[3] relate to venue and jurisdiction. At  
[4] least it's reasonably calculated to.  
[5] What I'm interested in knowing is where  
[6] he came across Mr. Ortiz and if he is in  
[7] this country, was in this country  
[8] legally, I could obtain additional  
[9] documentation to that effect.  
[10] I want to learn whether, for  
[11] example, Mr. Rizzo recruited Mr. Ortiz  
[12] from Pennsylvania or Philadelphia,  
[13] that's why I'm asking the question.  
[14] **MR. SMALL:** You can ask that  
[15] question, that's a totally different  
[16] question than what you asked.  
[17] **MR. CASEY:** If he is in the country  
[18] legally then there would be  
[19] documentation to that effect and I can  
[20] find out where the man hales from. That  
[21] is the reason I'm asking.  
[22] **BY MR. CASEY:**  
[23] **Q.** What is your understanding, sir, of Mr.  
[24] Ortiz' citizenship status as of the time that

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[1] you employed him?  
[2] A. At the time he had a license number, a  
[3] Social Security number, what it was, which I  
[4] have to get back to my secretary and find out  
[5] as far as all the paperwork and what she  
[6] received on him. I mean, as far as I know,  
[7] that's about as far as I can tell you about his  
[8] status.  
[9] Q. Was he on your payroll?  
[10] A. Yes.  
[11] Q. As of August 30, 2002?  
[12] A. Yes.  
[13] Q. You employed him on that date, sir?  
[14] A. Yes.  
[15] Q. Did your brother, Joseph Rizzo, have any  
[16] role in the work that was being done at the  
[17] 3220 Coachman Road address on August 30, 2002?  
[18] A. No, sir.  
[19] Q. What was his role in the company as of  
[20] that date, August 30, 2002?  
[21] A. He was president of the company.  
[22] Q. What was the business address of Ashland  
[23] Construction Company on August 30, 2002?  
[24] A. PO Box, actually, the actual mailing

[1] work, block, brick, stones, stucco. Anything  
[2] that falls in the masonry lines.  
[3] Q. What was the mix of your work between  
[4] residential and business masonry work?  
[5] A. I'm not, I don't understand the question.  
[6] Q. To what extent did you work at homes as  
[7] compared to, you know, businesses addresses,  
[8] like for companies, for example?  
[9] A. I'm not following his question.  
[10] MR. SMALL: He is still not following  
[11] your question.  
[12] BY MR. CASEY:  
[13] Q. Did you do primarily residential masonry  
[14] work?  
[15] A. We did residential and we did commercial  
[16] also.  
[17] Q. That's the word I should have used,  
[18] commercial.  
[19] A. I was trying to understand what you were  
[20] trying to ask.  
[21] Q. The word didn't come out, I apologize.  
[22] What was the mix of your work as between  
[23] residential and commercial?  
[24] A. As far as percentage, how much commercial

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[1] address was PO Box 283. That was Manchannin,  
[2] Delaware, 19710.  
[3] Q. That was PO box?  
[4] A. 283.  
[5] Q. And where did you actually have your  
[6] physical plant where you worked?  
[7] A. That was actually at 1800 West 11th  
[8] Street.  
[9] Q. In Wilmington?  
[10] A. Yes.  
[11] Q. Did you have any other business  
[12] addresses, that is Ashland Construction  
[13] Company, Incorporated?  
[14] A. No.  
[15] Q. What was your position at the company as  
[16] of August 30, 2002?  
[17] A. Vice-president, secretary, and I guess  
[18] all the other things that went into it.  
[19] Q. In what business was Ashland Construction  
[20] Company, Incorporated on August 30, 2002?  
[21] A. I'm sorry, repeat that.  
[22] Q. What did you folks do, what was your  
[23] business?  
[24] A. Our main line is all masonry concepts of

[1] as compared to residential?  
[2] Q. Yes.  
[3] A. I guess I really have to say probably  
[4] about fifty/fifty. I would say actually the  
[5] bulk of it is residential that we do, I would  
[6] probably say about 45 percent commercial.  
[7] Q. Did Ashland Construction Company,  
[8] Incorporated ever do masonry work in the  
[9] Commonwealth of Pennsylvania?  
[10] A. Gosh, it is so small. I mean, it is such  
[11] a small amount, if anything.  
[12] Q. My question is did Ashland Construction  
[13] Company ever do masonry work in Pennsylvania?  
[14] A. Yes.  
[15] Q. When did Ashland Construction Company  
[16] first do masonry work in the Commonwealth of  
[17] Pennsylvania, approximate date?  
[18] A. I cannot even begin to answer that  
[19] question, I have no idea.  
[20] Q. Do you have records, do you believe, that  
[21] would reflect your Pennsylvania clients?  
[22] A. I would have to go back and check. If  
[23] anything for, if anything I would have to check  
[24] to see, it's probably most likely would be

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[1] residential, which I would have to check on  
[2] them records.  
[3] **Q.** My question is do you believe you have  
[4] records that would reflect your Pennsylvania  
[5] clients?  
[6] **A.** I don't understand that question.  
[7] **MR. SMALL:** He doesn't understand,  
[8] Matt.  
[9] **BY MR. CASEY:**  
[10] **Q.** Do you keep records, sir, that if one  
[11] were to search, one would be able to determine  
[12] precisely those clients of yours that hale from  
[13] Pennsylvania?  
[14] **A.** If so, I mean, it's so small, I mean, I  
[15] would not even know. Like I said, there's a  
[16] very little bit amount of work we do in  
[17] Pennsylvania.  
[18] **Q.** My question though, sir, is different  
[19] than, I know you want to tell me it's a small  
[20] amount. I just want to know, first very  
[21] basically, do you believe that documents exist  
[22] that would tell a person, searching for  
[23] documents, relating to Pennsylvania, precisely  
[24] who your Pennsylvania clients are?

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[1] **A.** No, I doubt it. I mean I can, the only  
[2] one I would be able to check would be my  
[3] bookkeeper and see if she can go back that far  
[4] and whatever she could find into it, into my  
[5] file.  
[6] **Q.** What do you mean when you say go back  
[7] that far?  
[8] **A.** I mean, go back a year and see if there  
[9] are documents in there for Pennsylvania, but I  
[10] doubt there would even be, because there's such  
[11] a little amount of work that was done.  
[12] **Q.** I will give you the opportunity now to  
[13] tell me, if you would, in more detail what you  
[14] mean when you say a little amount. Can you  
[15] give me a percentage of your business?  
[16] **A.** Less than one percent.  
[17] **Q.** How much money do you believe your  
[18] company has earned in gross receipts, not  
[19] profit, in gross receipts, from masonry work  
[20] done in the Commonwealth of Pennsylvania?  
[21] **A.** Gosh, four, maybe five thousand, if that  
[22] seven, maybe in that area, that's what the  
[23] amount would be.  
[24] **Q.** Where did your company do work in

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[1] Pennsylvania, where specifically?  
[2] **A.** I mean, we did a couple, actually my  
[3] brother may have done a little bit up there for  
[4] homeowners, a couple small jobs for them.  
[5] That's the extent of it.  
[6] **Q.** When did that occur?  
[7] **A.** I don't even know the dates what it would  
[8] have been.  
[9] **Q.** Did you ever do work in Pennsylvania?  
[10] **A.** Small amounts.  
[11] **Q.** I know it's small amounts. My question  
[12] is, if you would, just listen to my question.  
[13] My question at this point is, did you ever do  
[14] work in Pennsylvania? The answer to that I  
[15] assume is yes?  
[16] **A.** Correct.  
[17] **Q.** When did you last do work in the  
[18] Commonwealth of Pennsylvania?  
[19] **MR. SMALL:** Matt, you want his best  
[20] estimate?  
[21] **BY MR. CASEY:**  
[22] **Q.** Sure.  
[23] **A.** I would say probably six months, seven  
[24] months ago.

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[1] **Q.** Where?  
[2] **A.** Actually Lomax Carpet.  
[3] **Q.** Lomax Carpet in Philadelphia?  
[4] **A.** In Philadelphia.  
[5] **Q.** For whom were you doing work at Lomax  
[6] Carpet in Philadelphia?  
[7] **A.** Actually for, actually John Manger got a  
[8] hold of me and said we need to do a little bit  
[9] of work up in that area.  
[10] **Q.** Who is that person, sir?  
[11] **A.** He is actually Air Base Carpet's  
[12] construction manager.  
[13] **Q.** Can you spell his last name?  
[14] **A.** M A N G E R.  
[15] **Q.** Where does he work out of?  
[16] **A.** As far as if --  
[17] **Q.** If you wanted to find him, where would  
[18] you call?  
[19] **A.** Actually I would call Air Base Carpet in  
[20] New Castle.  
[21] **Q.** And Mr. Manger, who to your  
[22] understanding, works out of the New Castle  
[23] building, called you and told you that he  
[24] wanted you to do some work at the Lomax Carpet



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[1] address in Philadelphia?  
[2] **A.** Correct.  
[3] **Q.** What did you do?  
[4] **A.** Gosh, just re-pointing up a wall inside  
[5] the stair tower.  
[6] **Q.** How much did you charge them for that  
[7] job?  
[8] **A.** I think right around seven thousand.  
[9] **Q.** I would like you, if you would, to have  
[10] your office check for the receipts from that  
[11] job specifically?  
[12] **A.** Yes.  
[13] **Q.** Towards the end of answering my discovery  
[14] request on the subject of contacts with the  
[15] Commonwealth of Pennsylvania. Will you do  
[16] that?  
[17] **A.** Yes.  
[18] **Q.** Did Ashland Construction Company, Inc. do  
[19] any masonry work at any other carpet marts in  
[20] the Commonwealth of Pennsylvania besides Lomax  
[21] on that date of approximately six months ago?  
[22] **A.** No, sir.  
[23] **Q.** How many times have you, yourself, been  
[24] to the Lomax Carpet address?

[1] Delaware or in Pennsylvania?  
[2] **MR. CASEY:** Any work.  
[3] **MR. MINTZER:** I object to the phrase  
[4] and any other of its affiliates.  
[5] **MR. CASEY:** I understand that  
[6] objection. To the extent the witness  
[7] understands the question I would like to  
[8] know, to what extent Ashland  
[9] Construction Company, Inc. did work for  
[10] Air Base.  
[11] **MR. SMALL:** That's a different  
[12] question.  
[13] **MR. CASEY:** Why don't you let him  
[14] answer the question. You can state your  
[15] objection and we can probably get  
[16] through this.  
[17] **MR. MINTZER:** Objection to that last  
[18] question.  
[19] **THE WITNESS:** Repeat the question.  
[20] **BY MR. CASEY:**  
[21] **Q.** Sir, tell me the extent to which Air Base  
[22] -- I'm sorry, Ashland Construction Company,  
[23] Inc. did work for Air Base?  
[24] **A.** When you say extent, I don't know what

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[1] **A.** I would probably say every bit of a dozen  
[2] times, half a dozen times, I go up and take a  
[3] look at some stuff that was, needed to be done  
[4] up there. Or just different issues, a little  
[5] bit of advice of what had to be done with  
[6] certain things.  
[7] **Q.** I'm sorry, you have been there about a  
[8] half a dozen times?  
[9] **A.** I would say about a half a dozen.  
[10] **Q.** Were you ever at that address other than  
[11] the job that you told me about that you did  
[12] about six months ago?  
[13] **A.** No.  
[14] **Q.** So the times that you were there were  
[15] specifically relating to the job that you did  
[16] approximately six months ago at the Lomax  
[17] Carpet address?  
[18] **A.** Correct.  
[19] **Q.** On how many occasions do you believe that  
[20] Ashland Construction Company, Inc. did work for  
[21] Air Base Carpet Mart or any of its affiliates?  
[22] **MR. MINTZER:** Objection to the form.  
[23] **MR. SMALL:** Again, when you're  
[24] talking about work, are you talking in

[1] you mean extent.  
[2] **Q.** You just told me about one job.  
[3] **A.** That's about the, I mean, that was it.  
[4] There wasn't a whole lot more after that. That  
[5] was the extent of it from that time.  
[6] **Q.** From what time? I didn't even give you a  
[7] time. I just want to know any other jobs that  
[8] you did for Air Base?  
[9] **A.** I mean, Mr. Casey, I'll have to go back  
[10] and list them. I don't remember them off the  
[11] top of my head.  
[12] **Q.** Can you give me your best estimate? I'm  
[13] not asking for specific jobs. I need your best  
[14] estimate for, start with this, the number of  
[15] occasions on which Ashland Construction Company  
[16] was hired by Air Base?  
[17] **A.** Per year?  
[18] **Q.** You can tell me in any respect?  
[19] **A.** Per year I would say maybe once, twice a  
[20] year.  
[21] **Q.** Going back how many years?  
[22] **A.** I guess for a couple years, about four or  
[23] five years.  
[24] **Q.** Going back to about the year 2000 you did

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[1] **MR. SMALL:** That is clearly not what  
[2] you requested in the production for  
[3] documents.

[4] **BY MR. CASEY:**

[5] **Q.** Did you search for any such documents?

[6] **MR. SMALL:** I'm going to object to  
[7] the form. You keep asking him the same  
[8] question.

[9] **MR. CASEY:** And it has not been  
[10] answered.

[11] **BY MR. CASEY:**

[12] **Q.** Sir, have you searched for any such  
[13] documents?

[14] **MR. SMALL:** Just don't answer the  
[15] question. This is getting ridiculous,  
[16] Matt.

[17] **MR. CASEY:** All right. Mark that  
[18] page also.

[19] **BY MR. CASEY:**

[20] **Q.** Sir, where physically would you look, if  
[21] you wanted to find documents relating to your  
[22] business activities with your Ridley Park  
[23] supplier?

[24] **A.** I mean, as far as where my materials

[1] Construction doesn't exist, as he  
[2] testified to earlier. It ended November  
[3] 2004, how would there be a bookkeeper?

[4] **MR. CASEY:** Mike, why don't you let  
[5] him answer that question?

[6] **THE WITNESS:** No, there is not a  
[7] bookkeeper for Ashland as of this time.

[8] **BY MR. CASEY:**

[9] **Q.** Where are the records located today?

[10] **MR. SMALL:** Again, don't answer the  
[11] question. You're going through the same  
[12] question eight times. You're not going  
[13] to get the answer.

[14] **BY MR. CASEY:**

[15] **Q.** Sir, was the job that you were doing at  
[16] the Coachman Road address, in any respect, a  
[17] block job?

[18] **A.** No, sir.

[19] **Q.** Where did you receive the materials for  
[20] the job that you were doing at the Coachman  
[21] Road address?

[22] **A.** Delaware Brick.

[23] **Q.** Sir, do you own any property, you  
[24] yourself?

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[1] would go?

[2] **Q.** Where would the documents be located?

[3] **A.** Certainly within the filing system, which  
[4] the bookkeeper would have kept.

[5] **Q.** Where is that filing system located?

[6] **MR. SMALL:** Again, we're going around  
[7] in circles. Don't answer that question.  
[8] We're doing a search, an ongoing search  
[9] but you're not going to go in and rifle  
[10] through the files. That is exactly what  
[11] is not going to happen.

[12] **BY MR. CASEY:**

[13] **Q.** Where are the files located?

[14] **MR. SMALL:** Don't answer the  
[15] question.

[16] **MR. CASEY:** Mark that page too.

[17] **BY MR. CASEY:**

[18] **Q.** Is there a bookkeeper today, sir?

[19] **A.** No.

[20] **MR. SMALL:** Again, for which entity?

[21] **BY MR. CASEY:**

[22] **Q.** For any of Ashland Construction Company,  
[23] Incorporated's documents?

[24] **MR. SMALL:** As of today Ashland

[1] **A.** I mean as far as where I live at?

[2] **Q.** Do you own any properties?

[3] **A.** Well, where I live, my house.

[4] **Q.** Other than your house, do you own any  
[5] other properties?

[6] **A.** I got, actually a place, actually a place  
[7] on Maple Avenue in Elsmere.

[8] **Q.** Where is that, in Delaware?

[9] **A.** That's in Delaware.

[10] **Q.** Do you own any properties in  
[11] Pennsylvania?

[12] **A.** No, sir.

[13] **Q.** Where did Ashland Construction Company,  
[14] Inc. deposit money, if any bank?

[15] **A.** WSFS.

[16] **Q.** Can you spell that out?

[17] **A.** Wilmington Savings Fund Society.

[18] **Q.** Did Ashland Construction Company, Inc.  
[19] receive any materials from any Pennsylvania  
[20] entity other than the Ridley Park supplier?

[21] **A.** No.

[22] **Q.** Other than actual masonry work that you  
[23] would do, upon being hired for a job, did  
[24] Ashland Construction Company Inc. engage in any